

EXHIBIT D

Expert Opinions and Psychological Interviews

Final Report

Jane Does I and II v. Bibb County School District
United States District Court, Middle District of Georgia
Civil Action No. 5:12-CV-468-MTT

Prepared by:
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EXHIBIT B: PSYCHOLOGICAL INTERVIEW WITH JANE DOE II**Identifying Information and Referral:**

Name: [REDACTED]
Age: 46 years old
Date of Interview: 8/19/2013
Parent of: [REDACTED]

[REDACTED] was referred for an interview by her attorneys, Hal Lewis, Jerry Lumley, and Brad Wilson. She was accompanied to the interview site by Mr. Wilson and her daughter [REDACTED] although Mr. Wilson did not sit in the interview or participate in the interview process. [REDACTED] was interviewed separately about herself prior to the interview with [REDACTED]. Comments [REDACTED] made regarding [REDACTED] were integrated into Exhibit A, and information in this report (Exhibit B) is primarily about [REDACTED] herself. This is not a full psychological evaluation, and as such, [REDACTED] personal history was not obtained.

[REDACTED] is a 46 year old single mother of six children, the oldest being her daughter [REDACTED]. It was previously reported prior to this interview that [REDACTED] was gang raped by seven male students at her previous high school, Northeast High School. Details of this assault were not asked of [REDACTED] during the present interview. [REDACTED] presented with symptoms of generalized anxiety and depression secondary to her daughter's sexual assault and the aftermath of the assault.

History of Presenting Problem:

[REDACTED] stated that she quit her job in an effort to more effectively care for [REDACTED] in the aftermath of the assault. She stated that she misses being on the bus and working. [REDACTED] stated that [REDACTED] was homebound for approximately one year, and during that time and the time that followed [REDACTED] could not work. She stated that she transports her to school daily, and that she experiences anxiety when [REDACTED] is away from her. She stated that once [REDACTED] is back at home, [REDACTED] feels better knowing that [REDACTED] is safe at home. [REDACTED] indicated that she does not feel safe when [REDACTED] is around other people for fear that they will harm her, and [REDACTED] asks [REDACTED] more questions about her day than she used to in an effort to glean as much knowledge as possible. [REDACTED] stated that on one occasion since the sexual assault a boy was "following" [REDACTED] and sat beside her, making [REDACTED] feel uncomfortable. [REDACTED] stated that she became upset over this situation and was worried for [REDACTED] safety.

When asked specifically about the Macon Police Department interview during which [REDACTED] seemingly indicated that the sexual assault had actually been consensual, [REDACTED] stated that she was angry about the situation and the way it was handled. She stated that [REDACTED] was very anxious, but the officers did not allow [REDACTED] to be present with her. [REDACTED] stated that the officers interviewed [REDACTED] and did not interview any other adults present, although they originally told [REDACTED], her parents, and her son's father that they would interview each of them individually. [REDACTED] stated that she became anxious while [REDACTED] was being interviewed, and she felt like the officers saw her get out of her seat because they met her so

quickly outside the waiting room. She stated that at that point they lied and told her that [REDACTED] was fine. [REDACTED] stated that this was a "set up" and she indicated that the officers created a situation in which it would be likely that [REDACTED] would recant by "forcing her" to tell [REDACTED] that she had not been raped. She stated that [REDACTED] was scared, crying, and shaking.

[REDACTED] was asked how she has been coping during the past year and a half. She stated that she feels angry and sad much of the time, that she is not sleeping or eating in adequate amounts and often cannot sleep at all, and she has a hard time feeling motivated to do things. She stated that daily life has become very difficult. She stated that her emotions spill over unexpectedly and without desire, and that she cries often and feels helpless. She stated that she struggles to focus. She stated that intrusive thoughts about [REDACTED] being sexually assaulted wake her up at night, and in her mind she hears [REDACTED] talk about how the perpetrators treated her during the assault. [REDACTED] reported that she tries to put all of these thoughts in the back of her mind but it is difficult. [REDACTED] stated that she does not trust people like she used to. [REDACTED] tearfully volunteered that she has noticed a decrease in her attention and focusing, as evidenced by running red lights or other activities that she does unintentionally. [REDACTED] denied suicidal ideation and she denied self-injury.

[REDACTED] cited an occasion in which she saw one of the perpetrators. She described a feeling of rage coupled with an urge to hit him, but instead she dropped her head and walked away. She stated that on another occasion her son brought to her attention that one of the perpetrators was in their vicinity at Walmart, and again she stated she did not interact with him but she described him as seeming scared. [REDACTED] stated that she knew one of the assailants; she assisted the boy in the wheel chair to and from his school bus as part of her job duties when she was a bus monitor. She indicated that her knowledge of this boy and her awareness that she used to assist him has been particularly difficult for her, and she has flashes of him (intrusive thoughts or images) all the time.

[REDACTED] stated that she has not wanted anyone to know that she has had such a difficult time coping with this situation. She stated that she tries to put on a happy face because she believes a mother is supposed to be strong. However, she tearfully reported that the way in which this trauma has affected her is starting to "come out on its own" through crying and feeling helpless. She stated that she feels as if she cannot do anything to help her daughter, and she most wants all of this "to be behind her." She stated that what hurts her most is knowing what [REDACTED] had to endure. She stated she is a happy-go-lucky person, and she feels beat up. She stated she feels as if no one cares about her child, and she loves her child.

[REDACTED] was asked to complete two self-administered questionnaires: The Beck Anxiety Inventory (BAI) and the Beck Depression Inventory (BDI) (see Exhibit C and Exhibit D, respectively). She completed both independently after being offered basic instructions. Both of these measures are psychometrically sound and widely administered, and they measure the severity of anxiety and depression, respectively. The BAI asks the respondent to indicate how much she/he has been bothered by each of 21 symptoms of anxiety during the past week, including the day the person is completing the questionnaire. [REDACTED] scored in the moderate range, although she scored the highest score in the moderate range, only one point away from the severe range. Her most severe symptoms were along the construct of panic and terror, such as

"fear of losing control," and "fear of the worst happening." She also indicated a number of physiological symptoms of anxiety such as numbness or tingling, dizziness or lightheadedness, heart pounding, difficulty breathing, and sweating. [REDACTED] indicated a number of symptoms of generalized anxiety in her verbal report, including worry, feelings of panic, fear about the future, anxiety about letting [REDACTED] be without her, and significant trouble sleeping.

The BDI asks the respondent to choose one statement out of a group of four statements that most accurately describes the way the respondent has been feeling in the past week, including the day the questionnaire is completed. [REDACTED] scored in the severe category, indicating that she has significant symptoms of depression. Some of the most severe items [REDACTED] endorsed included, "I am so sad or unhappy that I can't stand it," and "I feel I am being punished." Of all 21 items, the only ones [REDACTED] did not endorse were items on suicidality and weight loss. [REDACTED] indicated that she has trouble concentrating and attending, she has lost interest in things she used to enjoy, she has trouble motivating herself to get things done, she cries often, she feels sad and helpless, she has significant trouble sleeping including insomnia and early morning awakening without going back to sleep, and persistent physiological feelings of discomfort. [REDACTED] indicated that she experiences these symptoms near daily and most of the time.

[REDACTED] exhibits symptoms of PTSD even though she was not the direct victim of the sexual assault. [REDACTED] appeared to be traumatized by her knowledge of what [REDACTED] experienced, the traumatic police interviews and subsequent filing of charges against [REDACTED] for allegedly making false claims. She described intrusive thoughts including those that wake her from sleep, avoidance symptoms of pushing all of these thoughts to the back of her head so as not to bring up memories of the traumatic event, persistent and elevated negative evaluations about herself and others, a pervasive negative emotional state, loss of interest in activities she used to enjoy, and feeling detached from others, and difficulty concentrating, problems sleeping, irritability, and feeling constantly on guard.

Brief Psychosocial Information:

[REDACTED] stated she is a 46-year old single mother and a high school graduate. Her eldest child is [REDACTED], and she has five sons. She reported that she was working as a bus monitor on a bus for special education children prior to the sexual assault of her daughter [REDACTED]. She has not been working since [REDACTED] was assaulted so that she could effectively care for her daughter and transport her to school and appointments. She stated that the lack of income has become more and more difficult and that she feels like "less of a mom" because she cannot always provide for their needs and she does not like to ask for help. She indicated that her parents live nearby and [REDACTED] often stays with them. [REDACTED] is not currently married. She stated that in general, she and her children like to watch movies together, talk during dinnertime, and go to her parents' home, and her sons like to play ball with their friends.

Mental Status and Behavioral Observations:

[REDACTED] appeared her stated age. Her dress and hygiene were neat and she was well-groomed. Her psychomotor activity was within normal limits. She was alert and cooperative. Her speech was spontaneous and fluid, with average rate and volume. Pattern of detail was within normal

limits. She was oriented to person, place, time, and situation. Her thought content, as evidenced by speech, was logical, coherent, and goal-directed. Her mood was generally anxious and dysphoric. Expression of emotion was within normal limits and appropriate. She broke down and cried at the end of the interview, covering her face in her hands and asking me to sit with her until she was able to regain her composure. She talked about how difficult this experience has been for her emotionally. [REDACTED] judgment and insight appeared good and her motivation to participate in this interview, answer questions, and express herself was high. Her ability to provide historical facts in a linear fashion was high. It appears [REDACTED] provided a credible and valid account of [REDACTED] history and the series of events that happened on and after January 19, 2011. Her affect was consistent with the emotional content she was relating, and there were no inconsistencies across her verbal account.

Impression:

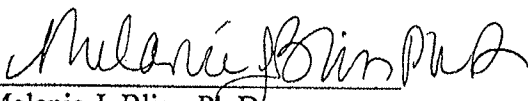
As previously indicated, this interview was not a comprehensive psychological evaluation of [REDACTED]. [REDACTED] For example, information about her family of origin, family history of mental illness, and medical history were not obtained, among others topic areas. However, in the course of talking with [REDACTED], it became apparent that she is suffering from mental health disorders. [REDACTED] demonstrates symptoms of depression, generalized anxiety disorder, and, more specifically, symptoms of posttraumatic stress disorder. She was encouraged during the course of this interview to seek counseling services and was provided with very brief (several sentences) psychoeducation about the fact that PTSD symptoms can affect parents or loved ones of those who experienced the trauma firsthand. [REDACTED] reported that she had a counseling appointment made for Wednesday of that week, and I strongly encouraged her to keep her appointment.

Recommendations:

I recommend the following:

1. [REDACTED] engage in psychotherapy services for herself with a focus on eliminating symptoms of depression, anxiety, posttraumatic stress, exhaustion and emotional fatigue.
2. A more thorough diagnostic evaluation by a mental health professional may reveal more specific recommendations regarding self-care, psychotropic medications, engaging in a routine that may include a return to part-time or fulltime work when she is ready, and assistance with her daughter.
3. Given that these events and the subsequent legal case is happening at the same time that [REDACTED] is becoming a young woman, [REDACTED] may benefit from counseling regarding resources for [REDACTED]. For example, [REDACTED] may want to consider possible job or educational opportunities for [REDACTED] that are commensurate with [REDACTED] level of functioning.

Signed:


Melanie J. Bliss, Ph.D.
Licensed Clinical Psychologist

9/18/13
Date

**EXHIBIT C: BECK ANXIETY INVENTORY (BAI) COMPLETED BY AND ABOUT
MS. [REDACTED] (one page)**



NAME

DATE

8-19-13.

Below is a list of common symptoms of anxiety. Please carefully read each item in the list. Indicate how much you have been bothered by each symptom during the PAST WEEK, INCLUDING TODAY, by placing an X in the corresponding space in the column next to each symptom.

| | NOT AT ALL | MILDLY It did not bother me much. | MODERATELY It was very unpleasant, but I could stand it. | SEVERELY I could barely stand it. |
|---|------------------|---|--|---|
| 1. Numbness or tingling. | | X | | |
| 2. Feeling hot. | X | | | |
| 3. Wobbliness in legs. | | X | | |
| 4. Unable to relax. | | | X | |
| 5. Fear of the worst happening. | | | X | |
| 6. Dizzy or lightheaded. | | X | | |
| 7. Heart pounding or racing. | | X | | |
| 8. Unsteady. | | X | | |
| 9. Terrified. | | | X | |
| 10. Nervous. | | | X | |
| 11. Feelings of choking. | X | | | |
| 12. Hands trembling. | | X | | |
| 13. Shaky. | | X | | |
| 14. Fear of losing control. | | | | X |
| 15. Difficulty breathing. | | X | | |
| 16. Fear of dying. | | | X | |
| 17. Scared. | | | X | |
| 18. Indigestion or discomfort in abdomen. | | X | | |
| 19. Faint. | X | | | |
| 20. Face flushed. | X | | | |
| 21. Sweating (not due to heat). | | X | | |

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**EXHIBIT D: BECK DEPRESSION INVENTORY (BDI) COMPLETED BY AND ABOUT
MS. [REDACTED] (two pages)**

Date: 8-19-13Name: [REDACTED]Marital Status: SingleAge: 46Sex: FOccupation: N/AEducation: graduated (12th)

This questionnaire consists of 21 groups of statements. After reading each group of statements carefully, circle the number (0, 1, 2 or 3) next to the one statement in each group which best describes the way you have been feeling the past week, including today. If several statements within a group seem to apply equally well, circle each one. Be sure to read all the statements in each group before making your choice.

| | |
|--|--|
| <p>1 0 I do not feel sad. 1 I feel sad. 2 I am sad all the time and I can't snap out of it. <u>3</u> I am so sad or unhappy that I can't stand it.</p> <p>2 0 I am not particularly discouraged about the future. <u>1</u> I feel discouraged about the future. 2 I feel I have nothing to look forward to. 3 I feel that the future is hopeless and that things cannot improve.</p> <p>3 0 I do not feel like a failure. <u>1</u> I feel I have failed more than the average person. 2 As I look back on my life, all I can see is a lot of failures. 3 I feel I am a complete failure as a person.</p> <p>4 0 I get as much satisfaction out of things as I used to. <u>1</u> I don't enjoy things the way I used to. 2 I don't get real satisfaction out of anything anymore. 3 I am dissatisfied or bored with everything.</p> <p>5 0 I don't feel particularly guilty. 1 I feel guilty a good part of the time. <u>2</u> I feel quite guilty most of the time. 3 I feel guilty all of the time.</p> <p>6 0 I don't feel I am being punished. 1 I feel I may be punished. 2 I expect to be punished. <u>3</u> I feel I am being punished.</p> <p>7 0 I don't feel disappointed in myself. <u>1</u> I am disappointed in myself. 2 I am disgusted with myself. 3 I hate myself.</p> | <p>8 0 I don't feel I am any worse than anybody else. 1 I am critical of myself for my weaknesses or mistakes. <u>2</u> I blame myself all the time for my faults. 3 I blame myself for everything bad that happens.</p> <p>9 <u>0</u> I don't have any thoughts of killing myself. 1 I have thoughts of killing myself, but I would not carry them out. 2 I would like to kill myself. 3 I would kill myself if I had the chance.</p> <p>10 0 I don't cry any more than usual. <u>1</u> I cry more now than I used to. 2 I cry all the time now. 3 I used to be able to cry, but now I can't cry even though I want to.</p> <p>11 0 I am no more irritated now than I ever am. <u>1</u> I get annoyed or irritated more easily than I used to. 2 I feel irritated all the time now. 3 I don't get irritated at all by the things that used to irritate me.</p> <p>12 0 I have not lost interest in other people. 1 I am less interested in other people than I used to be. <u>2</u> I have lost most of my interest in other people. 3 I have lost all of my interest in other people.</p> <p>13 0 I make decisions about as well as I ever could. 1 I put off making decisions more than I used to. <u>2</u> I have greater difficulty in making decisions than before. 3 I can't make decisions at all anymore.</p> |
|--|--|

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CONTINUED ON BACK

| | |
|---|---|
| <p>14 0 I don't feel I look any worse than I used to. 1 I am worried that I am looking old or unattractive. 2 I feel that there are permanent changes in my appearance that make me look unattractive. 3 I believe that I look ugly.</p> <p>15 0 I can work about as well as before. 1 It takes an extra effort to get started at doing something. 2 I have to push myself very hard to do anything. 3 I can't do any work at all.</p> <p>16 0 I can sleep as well as usual. 1 I don't sleep as well as I used to. 2 I wake up 1-2 hours earlier than usual and find it hard to get back to sleep. 3 I wake up several hours earlier than I used to and cannot get back to sleep.</p> <p>17 0 I don't get more tired than usual. 1 I get tired more easily than I used to. 2 I get tired from doing almost anything. 3 I am too tired to do anything.</p> <p>18 0 My appetite is no worse than usual. 1 My appetite is not as good as it used to be. 2 My appetite is much worse now. 3 I have no appetite at all anymore.</p> | <p>19 0 I haven't lost much weight, if any, lately. 1 I have lost more than 5 pounds. 2 I have lost more than 10 pounds. 3 I have lost more than 15 pounds.</p> <p>I am purposely trying to lose weight by eating less. Yes _____ No <input checked="" type="checkbox"/></p> <p>20 0 I am no more worried about my health than usual. 1 I am worried about physical problems such as aches and pains; or upset stomach; or constipation. 2 I am very worried about physical problems and it's hard to think of much else. 3 I am so worried about my physical problems that I cannot think about anything else.</p> <p>21 0 I have not noticed any recent change in my interest in sex. 1 I am less interested in sex than I used to be. 2 I am much less interested in sex now. 3 I have lost interest in sex completely.</p> |
|---|---|

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31 Total Score